

QUINN EMANUEL URQUHART & SULLIVAN, LLP  
Margret M. Caruso (Bar No. 243473)  
margretcaruso@quinnemanuel.com  
Sara L. Pollock (SBN 281076)  
sarapollock@quinnemanuel.com  
555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, California 94065  
Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

*Attorneys for Defendants io Products, Inc., OpenAI,  
Inc., OpenAI, LLC, and Sam Altman*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IYO, INC.,

Plaintiff,

vs.

IO PRODUCTS, INC., OPENAI, INC.,  
OPENAI, LLC, SAM ALTMAN, and SIR  
JONATHAN PAUL IVE,

Defendants.

Case No. 3:25-cv-04861

**CORPORATE DEFENDANTS’  
CORPORATE DISCLOSURE  
STATEMENT PURSUANT TO FEDERAL  
RULE OF CIVIL PROCEDURE 7.1 AND  
CERTIFICATION OF CONFLICTS AND  
INTERESTED ENTITIES OR PERSONS  
PURSUANT TO CIVIL LOCAL RULE 3-  
15**

Judge: Hon. Trina L. Thompson

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, IO Products, Inc. states that it has no parent corporation and that no publicly held corporation has a financial interest of 10% or more.

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, OpenAI, Inc. states that it has no parent corporation and that no publicly held corporation has a financial interest of 10% or more.

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, OpenAI, LLC states that it is a subsidiary of OpenAI Global, LLC, and that Microsoft Corporation is a publicly held corporation that has a financial interest of 10% or more in OpenAI Global, LLC.

1 Pursuant to Civil L.R. 3-15, the undersigned certifies that as of this date, there is no conflict  
2 or interest (other than the named parties) to report.

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4  
5 Dated: June 12, 2025

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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7 By: /s/ Margret M. Caruso

8 Margret M. Caruso

9 *Attorneys for Defendants io Products, Inc.,  
OpenAI, Inc., OpenAI, LLC, and Sam Altman*